

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In Re:

GENERAL MOTORS LLC IGNITION
SWITCH LITIGATION

This Document Relates to: All Actions

MDL No. 2543

Master File No.: 14-MDL-2543 (JMF)

KING & SPALDING LLP'S MOTION TO FILE UNDER SEAL

Pursuant to this Court's Individual Rules and Practices 6(B) and MDL Order No. 10 ¶7(c), and MDL Order No. 77, non-party King & Spalding LLP ("K&S") seeks leave to temporarily file, under seal, Exhibit C to its Sur-Reply to Plaintiffs' Motion to Compel Production of Documents from New GM and K & S Based on the Crime-Fraud Exception (Document 1341). New GM has designated lines 4 through 23 on page 431 of Exhibit C (Document 1341-4) as Confidential or Highly Confidential under the protective order in this case. Other parts of Exhibit C have been omitted or redacted on relevance grounds.

This 17th day of September, 2015.

By:



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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of September, 2015, I electronically filed the foregoing ***King & Spalding LLP'S Motion to File under Seal*** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the registered e-mail addresses for each attorney of record:

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